

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

07 CV-6491(whp)

CHLOE, S.A.S, J.CHOO LIMITED,
Plaintiffs
-against-

CROSS-CLAIM REPLY

KEN CHEN A/K/A/ SHU CHEN A/K/A
XIANG CHEN, QUICK GLOBAL SHIPPING,
SONG GAO, LISA WU,
ET, AL.

Defendants

The defendant Yan He Xia, in replying to the cross- claims of the defendant Howard Shipping Express a/k/a Howard Shipping Express Inc.

- 1) Upon the EFC system's designating Yan He Xia a cross-claim defendant of Howard Shipping Express a/k/a Howard Shipping Express Inc.;
- 2) This defendant in reply to the Cross-Claims of Howard Shipping Express a/k/a Howard Shipping Express Inc hereby alleges:
- 3) This defendant denies each and every cross-claim interposed against this defendant and all paragraphs and/or statements of fact comprising said cross-claim.

AS AND OR A FIRST AFFIRMATIVE DEFENSE TO SAID CROSS CLAIMS.

- 4) This answering defendant has no business relationship to Howard Shipping Express a/k/a Howard Shipping Express Inc. and does not utilize any service provided by said cross-claimant.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

- 5) No cross-claims against this replying defendant have been observed as part of the cross-claimant's answer to the amended complaint,(regardless of the EFC's designation of this replying defendant as a cross-claim defendant.)

Wherefore, may this honorable court dismiss any and all cross claims against this replying defendant.

_____/s/_____
Mark P. Getzoni MG(1630)
Attorney for the defendant
Yan He Xia

Dated: September 27th, 2007

Forest Hills, NY